

## **CE01140617-03 Potential IWE Non-compliance**

### **Event Description**

This CE evaluates failure to report refuel cavity leakage and the associated potential for degradation of the containment vessel as required for the IWE program.

The Code of Federal Regulations 10CFR50.55a requires in paragraph (b)(2)(ix)(A) that “the licensee shall evaluate the acceptability of inaccessible areas when conditions exist in accessible areas that could indicate the presence of or result in degradation to such inaccessible areas. For each inaccessible area identified, the licensee shall provide the following in the ISI Summary Report as required by IWA-6000: A description of the type and estimated extent of degradation, and the conditions that led to the degradation; An evaluation of each area, and the result of the evaluation, and; A description of necessary corrective actions.

Refuel cavity leakage that contacts the containment vessel is considered “conditions in accessible areas that could indicated the presence of or result in degradation of inaccessible areas”. Accordingly, the site should have included a discussion of the leakage in the 90 day summary report following each outage that such leakage occurred. The site failed to report the 2R24 refuel cavity leakage and previously in 2R22.

The primary purpose of this CE is to identify instances of leakage since the beginning of the current IWE interval (September of 1996) that were not appropriately reported. Following is a summary of refuel cavity leakage events and report status based on a review of associated CAPs, 90 day summary reports, and other sources such as program notes. The following is based on a reasonable search of available documentation and may not be complete or conclusive.

<b>Outage</b>	<b>Approx. Date</b>	<b>Leakage</b>	<b>Cap #</b>	<b>Included in 90 Day Report?</b>
2R18	Apr-97	Unknown		
1R19	Oct-97	Unknown		
2R19	Oct-98	Leakage in Sump B and other locations. Initial AES evaluation.	00051045	Yes. Reported by amendment AR00122811
1R20	Apr-99	Leakage in Sump B and other locations.	00057041	Yes. Reported by amendment AR00122811
2R20	Apr-00	Unknown		
1R21	Jan-01	No Leakage. Installed Strippable liner.		N/R
2R21	Feb-02	No Leakage. Installed Strippable liner.		N/R
1R22	Nov-02	Leakage in Sump B. Strippable liner failed to stop leakage.	00284714	Yes. Included in original summary report.
2R22	Sep-03	Leakage in various locations.	00531162	Failed to include in report.
1R23	Sep-04	Leakage noted in regen room	00751496	N/R

2R23	May-05	No Leakage. Caulked penetrations		N/R
1R24	May-06	No Leakage. Caulked penetrations		N/R
2R24	Nov-06	Leakage in Sump B. Revised AES evaluation.	01064513	Failed to include in report.
1R25	Jan-08	No Leakage. Caulked penetrations		N/R

Indications are the site failed to report leakage for 2R22 and 2R24. Other outages either did not have leakage or the status of leakage and the need to report is unknown.

**Corrective Actions and Final Disposition**

A corrective action AR 01140617-05 has been initiated to submit an amendment to the 2R22 and 2R24 90 day summary reports to meet the requirements of 10CFR50.55a(b)(2)(ix)(A). Submission of the amendment will restore compliance and allow the associated OBN to be closed.